

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

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MAR 29 2006

Mr. Mike VanVooven
Collins & Aikman - Columbia Operations
4000 Waco Road
Columbia, MO 65202

Re: Collins & Aikman - Columbia Operations, 019-0062
Permit Number: **OP2006-017**

Dear Mr. VanVooven:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:msb

Enclosure(s)

c: Ms. Tamara Freeman, U.S. EPA Region VII
PAMS File: 2004-06-063



INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2006-017

Expiration Date:

Installation ID: 019-0062

Project Number: 2004-06-063

Installation Name and Address

Collins & Aikman - Columbia Operations
4000 Waco Road
Columbia, MO 65202
Boone County

Parent Company's Name and Address

Collins & Aikman, Inc.
350 Stephenson Highway
Troy, MI 48083

Installation Description:

Collins & Aikman - Columbia Operations operates an automotive interior plastic parts manufacturing installation in Boone County. Processes at this installation include shell making, clear-coat and topcoat application, injection molding, finish assembly, selective sealing and parts cleaning area.

MAR 29 2006

Effective Date

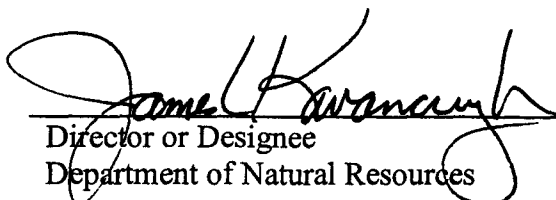

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Collins & Aikman - Columbia Operations operates an automotive interior plastic parts manufacturing installation in Boone County. Processes at this installation include shell making, clear-coat and topcoat application, injection molding, finish assembly, selective sealing and parts cleaning area.

The most recent five (5) years of actual emissions reported from the EIQ are included below.

2000	0.16	0.01	2.06	15.75	1.73	--	--
2001	0.17	0.01	2.21	31.36	1.5	--	--
2002	0.17	0.01	2.26	18.25	1.9	--	0.36
2003	0.23	0.02	3.09	24.87	2.60	--	0.02
2004	0.21	0.02	2.76	17.65	2.31	--	0.09

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	Painting Booth 1
EU0020	Painting Booth 2
EU0030	Painting Booth 3B
EU0040	Painting Booth 4B
EU0050	Selective Sealing Process 6
EU0060	Selective Sealing Process 6A
EU0070	Parts Cleaning Area

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<u>Description of Emission Source</u>	
Two (2) Natural Gas Boilers (1.01 MMBtu/hr each)	EP-01
One (1) Natural Gas Boiler (0.75 MMBtu/hr)	EP-01
Eight (8) Natural Gas Burners (3.15 MMBtu/hr each)	EP-01
Two (2) Natural Gas Molding Furnaces (8.0 MMBtu/hr each)	
Four (4) Natural Gas Paint Booth Ovens (0.4 MMBtu/hr each)	
Four (4) Hot Water Heaters	
Load Powder Box	
Injection Molding	EP-08
Hot Plate	

Poly Tanks (6,000 gallons)	EP-04
Iso Tank (6,000 gallons)	EP-05
Glue and Staple	
Hot Wire Trimming	
Resin Silos	
Vapor Hone	
Parts Washer (water only)	
Plastic Regrind	
Shell Mold Cleaning	
Rework	
Vibration Welder	
Paint Mixing	
Heat Stake	
Water Trimming Unit	
Die Punch for Trimming	
Pour Molds	
Score Machine	

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Missouri Department of Natural Resources Construction Permit #1294-018
- 2) Missouri Department of Natural Resources Construction Permit #1196-002
- 3) Missouri Department of Natural Resources Construction Permit #0897-022
- 4) Missouri Department of Natural Resources Construction Permit #0198-012
- 5) Missouri Department of Natural Resources Construction Permit #012000-022
- 6) Missouri Department of Natural Resources Construction Permit #052002-007
- 7) Missouri Department of Natural Resources Construction Permit #022003-003

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

Permit Condition PW001

10 CSR 10-6.065

Operating Permits

Voluntary Permit Limitation, 10 CSR 10-6.065(6)(C)2.A

Emission Limitation:

- 1) This installation shall emit less than 10 tons of any individual hazardous air pollutant in any 12 month rolling period.
- 2) This installation shall emit less than 25 tons of any combination of hazardous air pollutants in any 12-month rolling period.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of HAP's emitted into the atmosphere from the installation. The permittee shall use Attachments B and C, or equivalent forms, to verify compliance with the emission limitations listed above.
2. These records shall be made immediately available for inspection to the Department of Natural Resources personnel upon request.
3. These records shall be kept on-site for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeded the emission limitation.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

Permit Condition PW002

10 CSR 10-6.065

Operating Permits

Voluntary Permit Limitation, 10 CSR 10-6.065(6)(C)2.A

Emission Limitation:

This installation shall emit less than 100 tons of volatile organic compounds in any 12 month rolling period.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of volatile organic compounds emitted into the atmosphere from the installation. The permittee shall use Attachment I, or equivalent form, to verify compliance with the emission limitation listed above.
2. These records shall be made immediately available for inspection to the Department of Natural Resources personnel upon request.
3. These records shall be kept on-site for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeded the emission limitation.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

EU0010 through EU0030 Painting Booth 1 Painting Booth 2 Painting Booth 3B			
Emission Unit #	General Description	Manufacturer/Model #	EQ Reference # (Year)
EU0010	Painting Booth 1; – shell mods 1A or 1B; MHDR 0.87 gal/hr; equipped with filter with 100% capture efficiency and 98% control device efficiency	Textron Industrial Equipment Group	EP-02 (2003)
EU0020	Painting Booth 2; –shell mods 2A or 2B; MHDR 0.87 gal/hr; equipped with filter with 100% capture efficiency and 98% control device efficiency	Textron Industrial Equipment Group	EP-02 (2003)
EU0030	Painting Booth 3B; shell mods 3B; MHDR 0.75 gal/hr; equipped with filter with 100% capture efficiency and 98% control device efficiency	Infra-red Technologies/DeVilbiss	EP-02 (2003)

Permit Condition (EU0010 through EU0030)-001

10 CSR 10-6.220

Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on these emission units (EU0010 through EU0030) using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-

- b) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
- c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment E), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment F)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)
4. Attachments E, F and G contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
6. All records shall be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined using the Method 9 test that the emission units exceeded the opacity limit.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be with the annual compliance certification, as required by Section IV of this permit.

Permit Condition (EU0010 through EU0030)-002

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. Particulate matter shall not be emitted from EU0010 through EU0040 in excess of the amount listed in the following table:

Particulate Matter Emission Limitation		
EU0010	Painting Booth 1	0.10
EU0020	Painting Booth 2	0.10
EU0030	Painting Booth 3B	0.09

2. These emission rates were calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:
E = rate of emission in lb/hr
P = process weight rate in tons/hr
3. The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring:

1. EU0010 through EU0030 shall not be operated without a filter in place.
2. The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
3. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Attachment H)
2. The permittee shall maintain records of maintenance performed on the booths and of filter replacements when they occur. (See Attachment F)
3. Attachments H and F contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
4. These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
5. All records shall be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeded the limitation of this permit condition.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

EU0040 Painting Booth 4B			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (Year)
EU0040	Painting Booth 4B; shell mod 4B; MHDR 0.34 gal/hr; equipped with filter with 100% capture efficiency and 98% control device efficiency; installed 2002	Infra-red Technologies/DeVilbiss	EP-02 (2003)

Permit Condition EU0040-001

10 CSR 10-6.060

Construction Permit Required

APCP Construction Permit #052002-007

Emission Limitation:

1. The permittee shall not discharge into the atmosphere from EU0040 Glycol Ether Compounds in excess of 5.0 tons in any consecutive 12-month period. [Special Condition 1.A]
2. The permittee shall not discharge into the atmosphere from EU0040 combined HAPs in excess of 24.0 tons in any consecutive 12-month period. [Special Condition 1.A]
3. The permittee shall not discharge into the atmosphere from EU0040 Volatile Organic Compounds (VOC) in excess of 39.0 tons in any consecutive 12-month period. [Special Condition 1.A]

4. The permittee shall not use any surface coatings in EU0040 containing HAPs other than Glycol Ether Compounds, Triethylamine, and Xylene Compounds until a permit application is submitted to, and approved by, the Missouri Department of Natural Resources Air Pollution Control Program. [Special Condition 1.A]

Monitoring:

1. The permittee shall maintain an accurate record of VOC and HAPs emitted into the atmosphere from EU0040. [Special Condition 1.B]
2. All surface coatings that emit VOC and HAPs shall be kept in tightly sealed containers during transport and storage. Cleaning cloths used with the cleanup solutions must be kept in tightly closed containers when not in use and while awaiting off-site transportation. [Special Condition 1.D]

Record Keeping:

1. The permittee shall record the monthly and rolling 12-month totals of VOC and HAPs emitted from EU0040. [Special Condition 1.B]
2. The permittee shall use Attachment B, *Monthly Individual HAP Tracking Record*, Attachment C, *Monthly Combined HAP Tracking Record*, and Attachment I, *Monthly VOC Tracking Record* or equivalent form(s). [Special Condition 1.B]
3. The permittee shall maintain all records required by this condition, on-site, for the 60 most recent months, and shall immediately make such records available to any Missouri Department for Natural Resources personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials associated with EU0050 for which records are kept. [Special Condition 1.B]

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which records from Special Condition 1.B of construction permit #052002-007 indicate that the source exceeded the limitations of Condition 1.A of construction permit #052002-007. [Special Condition 1.C]
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

Permit Condition EU0040-002

10 CSR 10-6.220

Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any new source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on EU0040 using the procedures contained in USEPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission

unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment E), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment F)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment G)
4. Attachments E, F and G contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
6. All records shall be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

Permit Condition EU0040-003

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. Particulate matter shall not be emitted from EU0040 in excess of 0.05 lb/hr.
2. The emission rate was calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:
E = rate of emission in lb/hr
P = process weight rate in tons/hr

3. The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring:

1. EU0040 shall not be operated without a filter in place.
2. The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
3. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. (See Attachment H)
2. The permittee shall maintain records of maintenance performed on the booths and of filter replacements when they occur. (See Attachment F)
3. Attachments F and H contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
4. These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
5. All records shall be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records indicate that the source exceeded the limitation of this permit condition.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

EU0050 Selective Seal Process 6			
Emission Unit #	General Description	Manufacturer/ Model #	EQ Reference # (2003)
EU0050	Spraying of adhesive on plastic molded insert; installed 1996; MHDR 6.04 lb adhesive/hr	Butzer	EP-06

Permit Condition EU0050-001

10 CSR 10-6.060

Construction Permit Required

APCP Construction Permit #0198-012

Emission Limitation:

The permittee shall emit less than 40.0 tons of volatile organic compounds (VOC) from EU0050 in any consecutive 12-month period. [Special Condition 1]

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of VOC emitted into the atmosphere from EU0050. These records shall include monthly and consecutive 12-month totals. [Special Condition 2]

2. These records shall be kept on-site for the most recent 60-month period of operation and shall be made immediately available to Department of Natural Resources personnel upon request. [Special Condition 2]
3. Attachment I, or an equivalent record containing the same information, must be used to certify compliance with this requirement. [Special Condition 2]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition 2 of construction permit #0198-012 indicate that the source exceeded the emission limitation of Special Condition 1 of construction permit #0198-012. [Special Condition 5]
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

EU0060 Selective Process 6A			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2003)
EU0060	Spraying of adhesive on plastic molded insert; installed 2000; MHDR 12.5 lb adhesive/hr	N/A	EP-06

Permit Condition EU0060-001

10 CSR 10-6.060

Construction Permit Required

APCP Construction Permit #012000-022

Emission Limitation:

1. The permittee shall emit less than 40.0 tons of volatile organic compounds (VOC) from EU0060 in every consecutive 12-month period. [Special Condition 1]
2. The permittee shall not use an adhesive in EU0060 than contains any HAP other than Xylene, Hexane, and Toluene without prior approval from the Air Pollution Control Program. [Special Condition 6]

Monitoring/Record Keeping:

1. The permittee shall record the monthly and the sum of the most recent consecutive 12-month VOC emissions in tons from EU0060. [Special Condition 2]
2. The permittee shall keep records of the HAP contents of the adhesives used in EU0060. [Special Condition 6]
3. These records shall be kept on-site for five (5) years and shall be made immediately available for inspection to Department of Natural Resources personnel upon request. [Special Condition 2 and 4]
4. Attachment I and Attachment J, or equivalent forms, must be used to certify compliance with this requirement. [Special Condition 2 and 4]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which records indicate that the source exceeded the emission limitation of Special Conditions 1 and/or 6 of construction permit #012000-022. [Special Condition 5]

2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

EU0070 Parts Cleaning Area			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (2003)
EU0070	Parts cleaning area; installed 1997	Custom built	EP-07

Permit Condition EU0070-001

10 CSR 10-6.060

Construction Permit Required

APCP Construction Permit #0897-022

Emission Limitation:

1. The permittee shall not discharge into the atmosphere from the parts cleaning areas volatile organic compounds (VOC) in excess of eight 8 tons in any consecutive 12-month period. [Special Condition 1]
2. The permittee shall not use any solvent cleanup material for this process that contains any HAP as listed in 10 CSR 10-6.020, Table 3. [Special Condition 5]
3. If a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require the permittee to submit a corrective action plan within ten (10) days to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of this permit. [Special Condition 8]

Monitoring:

Cleanup solvents shall be kept in tightly covered tanks or containers during transport and storage. Cleaning cloths used with the cleanup solvents must be placed in tightly closed containers when not in use and while awaiting off-site transportation. [Special Condition 7]

Record Keeping:

1. The permittee shall maintain an accurate record of VOC emitted into the atmosphere from this process. The permittee shall record the monthly and running 12-month totals of VOC emissions from this process. The permittee shall use Attachment I or an equivalent form for this purpose. [Special Condition 2]
2. The permittee shall maintain records of the solvent cleanup material used with the parts cleaning area. The Material Safety Data Sheets (MSDS) for the solvent cleanup materials will be the only record which can be used to determine compliance with this requirement. [Special Condition 6]
3. The permittee shall maintain all records required by this permit, on-site, for the most recent 60 months, and shall immediately make these records available to Missouri Department of Natural Resources personnel upon request. [Special Condition 3]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the records from Special Conditions 2 and/or 6 of construction permit #0897-022 indicate that the source exceeded the limitation of Special Conditions 1 or 5. [Special Condition 4]

2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted with the annual compliance certification, as required by Section IV of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin

operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;

- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Collins & Aikman - Columbia Operations from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61

Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).

- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

**10 CSR 10-6.065, §(5)(C)1, §(5)(C)3, §(6)(C)3.B, and §(6)(C)3.E.(I) – (III) and (V) – (VI)
Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by W. B. Quillen, Plant Manager. The Air Pollution Control Program was informed during the review of this permit application that the responsible official at this installation is now Mike Van Booven. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. ATTACHMENTS

Attachments follow.

Attachment B
Monthly Individual HAP Tracking Record

This is an example of a form that may be used to record data required by Permit Conditions PW001 and EU0040-001.

- In order to demonstrate compliance with Permit Condition PW001, Collins & Aikman must demonstrate that the entire installation emits less than 10 tons of any individual HAP in any consecutive 12-month period.
- In order to demonstrate compliance with Permit Condition EU0040-001, Collins & Aikman must demonstrate that EU0040 emits less than 5.0 tons of Glycol Ether Compounds in any consecutive 12-month period and does not use any surface coatings containing HAPs other than Glycol Ether Compounds, Triethylamine, and Xylene Compounds.

This sheet covers the month of _____ in the year _____

This sheet covers the entire installation _____ - or - EU0040 only _____.

[illegible]

Note 1: Type of material used.

Note 2: Name of the HAP contained in the material that was used. Since this sheet is for tracking individual HAP emission totals, all the HAPs listed in this column should be the same.

Note 3: Use the appropriate emission factor for the appropriate application material and method.

Note 4: The emission factors units used should correspond to the throughput units.

Note 5: Report HAP emissions in tons. For example, if Column D is in gallons and Column F is in lbs/gallon then Column I = [(Column C) x (Column E)]/2000.

Note 6: Sum of HAP emissions reported in Column I.

Note 7: Running 12-month total of HAP emissions.

Note 8: HAP emissions reported for this month in the last calendar year.

Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6.

Attachment C

Monthly Combined HAP Tracking Record

This is an example of a form that may be used to record data required by Permit Condition PW001 and EU0040-001.

- In order to demonstrate compliance with Permit Condition PW001, Collins & Aikman must demonstrate that the entire installation emits less than 25 tons of combined HAPs in any consecutive 12-month period.
- In order to demonstrate compliance with Permit Condition EU0040-001, Collins & Aikman must demonstrate that EU0040 emits less than 24 tons of combined HAPs in any consecutive 12-month period.

This sheet covers the month of _____ in the year _____

This sheet covers the entire installation _____ or EU0040 only _____.

Total HAP Emissions Calculated for this Month (tons)	(Note 6)					
12-Month HAP Emissions Total From Previous Month's Worksheet (tons)	(Note 7)					
Monthly HAP Emissions Total From Previous Year's Worksheet (tons)	(Note 8)					
Current 12-Month Total HAP Emissions (tons)	(Note 9)					

Note 1: Type of material used.

Note 2: Name of the HAP contained in the material that was used.

Note 3: Use the appropriate emission factor for the appropriate application material and method.

Note 4: The emission factors units used should correspond to the throughput units.

Note 5: Report HAP emissions in tons. For example, if Column D is in gallons and Column F is in lbs/gallon then Column I = [(Column C) x (Column E)]/2000.

Note 6: Sum of HAP emissions reported in Column I.

Note 7: Running 12-month total of HAP emissions.

Note 8: HAP emissions reported for this month in the last calendar year.

Note 9: Amount reported in Note 7 minus amount reported in Note 8 plus amount reported in Note 6.

[illegible]

This record keeping sheet or something similar may be used to record inspections of equipment maintenance, repairs and malfunctions.

[illegible]

Attachment G Method 9 Opacity Emissions Observations

This record keeping sheet or something similar may be used for the record keeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time		Opacity					
	Start	End	Sum	Average				

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation?

 YES NO Signature of Observer

Attachment H

This attachment may be used to show compliance with the limitations of 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* for the emission units listed.

The following table shows that EU0010 through EU0040 will not emit PM in excess of the emission rate limit when the associated control device is operating properly.

EU0010	8.02	0.0040	35	700	50%	98%	1.40	0.03	0.10
EU0020	8.02	0.0040	35	700	50%	98%	1.40	0.03	0.10
EU0030	6.94	0.0035	35	700	50%	98%	1.21	0.02	0.09
EU0040	3.15	0.0016	34	680	50%	98%	0.54	0.01	0.05

1 - MHDR of paint usage is limited by part throughput

Sample Calculation

Emission Rate Limit:

$$E = 4.10(P)^{0.67}$$

P is process weight rate in tons/hour

E is emission rate limit in lb/hour

$$E = 4.10(0.004)^{0.67} = 0.10 \frac{\text{lb PM}}{\text{hour}}$$

Controlled Emission Rate:

$$\text{Emission Factor} = (X\% \text{ solids}/100)(2000) = (35/100)(2000) = 700 \text{ lb/ton}$$

$$\text{Emission Rate} = (\text{MHDR})(\text{Emission Factor}) \left(1 - \frac{\text{Transfer eff}}{100} \right) \left[1 - \left(\frac{\text{Capture eff}}{100} \right) \left(\frac{\text{Control eff}}{100} \right) \right]$$

$$\text{Emission Rate} = \frac{0.004 \text{ ton}}{\text{hour}} \times \frac{700 \text{ lb PM}}{\text{ton}} \times (1 - 0.50) (1 - (1.00 \times 0.98)) = 0.03 \frac{\text{lb PM}}{\text{hour}} < 0.1 \frac{\text{lb PM}}{\text{hour}}$$

The following table shows that EU0010 through EU0060 are in compliance with the limit of 0.3 grains/dscf.

EU0010	0.03	77	10000	9,832	0.000	0.30
EU0020	0.03	77	10000	9,832	0.000	0.30
EU0030	0.02	77	6400	6,293	0.000	0.30
EU0040	0.01	77	6400	6,293	0.000	0.30

Sample Calculation

$$\text{Potential PM Concentration} = \frac{0.03 \text{ lb PM}}{\text{hr}} \times \frac{7000 \text{ gr}}{\text{lb}} \times \frac{\text{min}}{9,832 \text{ scf}} \times \frac{1 \text{ hr}}{60 \text{ min}} = 0.0004 \frac{\text{gr PM}}{\text{scf}}$$

Attachment I Monthly VOC Tracking Record

This is an example of a form that may be used to record data required by Permit Conditions PW002, EU0040-001, EU0050-001, EU0060-001 and EU0070-001.

- In order to demonstrate compliance with the Permit Condition EU0040-001, Collins & Aikman must demonstrate that EU0040 emits less than 39.0 tons of VOC in any consecutive 12- month period.
- In order to demonstrate compliance with Permit Conditions EU0050-001 and EU0060-001, Collins & Aikman must demonstrate that EU0050 and EU0060 each emit less than 40.0 tons of VOC in any consecutive 12-month period.
- In order to demonstrate compliance with the Permit Condition EU0070-001, Collins & Aikman must demonstrate that EU0070 emits less than 8.0 tons of VOC in any consecutive 12- month period.
- In order to demonstrate compliance with the Permit Condition PW002, Collins & Aikman must demonstrate that the installation emits less than 100.0 tons of VOC in any consecutive 12- month period.

This sheet covers the month of _____ in the year _____.

This sheet covers Emission Unit # _____.

(b) Total VOC Emissions Calculated for this Month in ton:				
(c) 12-Month VOC emissions Total from Previous Month's Attachment I, in ton:				
(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment I, in ton:				
(e) Current 12-month Total of VOC Emissions in ton: [(b) + (c) - (d)]				

Instructions: Choose appropriate VOC calculation method for units reported:

- (a) 1) If usage is in ton - $[\text{Column 2}] \times [\text{Column 4}] = [\text{Column 5}]$;
- 2) If usage is in pounds - $[\text{Column 2}] \times [\text{Column 4}] \times [0.005] = [\text{Column 5}]$;
- 3) If usage is in gallons - $[\text{Column 2}] \times [\text{Column 3}] \times [\text{Column 4}] \times [0.005] = [\text{Column 5}]$
- (b) Summation of [Column 5] in ton;
- (c) 12-Month VOC emissions total (e) from last month's Attachment I, in ton;
- (d) Monthly VOC emissions total (b) from previous year's Attachment I, in ton;
- (e) Calculate the new 12-month VOC emissions total.

This is an example of a form that may be used to record data required by Permit Condition EU0060-001. In order to demonstrate compliance with Permit Condition EU0060-001, Collins & Aikman must demonstrate that EU0060 does not use any adhesive in EU0060 that contains a HAP other than Xylene, Hexane, or Toluene without prior permission from the APCP.

[illegible]

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1. Part 70 Operating Permit Application, received 6/15/04;
2. 2003 Emissions Inventory Questionnaire, received 3/31/04;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Emission Units EU0010 through EU0030

These emissions units consist of Painting Booth 1, Painting Booth 2, and Painting Booth 3B. It should be noted that paint booth 1 processes parts made in shell mod 1A and 1B, paint booth 2 processes parts made in shell mod 2A and 2B, and paint booth 3A processes parts made in shell mod 3A. Paint booth 3B processes parts made in shell mod 3B. Paint booth 4A processes parts made in shell mod 4A. Paint booth 4B processes parts made in shell mod 4B. Paint booth 5C has been removed.

Attachments

Attachment D has been removed from the permit. No attachment has been put in its place, nor have the balance of the attachments been renamed to fill the gap.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-6.100, *Alternate Emissions Limits*

This rule has been included in the operating permit because the rule is a core permit requirement.

10 CSR 10-6.280, *Compliance Monitoring Usage*

This rule has been included in the operating permit because the rule is included as a core permit requirement for all installations in Missouri.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Process*

This rule was included in the operating permit because it applies to EU0010 through EU0060.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

In the operating permit application, the permittee indicated that the natural gas boilers were subject to this rule. It is highly unlikely that the minimal emissions from these natural gas fired units would ever exceed the particulate matter emission limitation. Therefore, this rule has not been applied to the natural gas fired emission units located at this installation.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

In the operating permit application, the permittee indicated that the natural gas direct-fired burners and natural gas boilers were subject to this rule. However, according to 10 CSR 10-6.260(1)(A)2, combustion equipment that uses exclusively pipeline grade natural gas is exempt from this rule. Therefore, this rule has not been applied to the natural gas fired emission units located at this installation.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

1. APCP Construction Permit #1294-018
The foam spraying process permitted by this construction permit was eliminated from the installation in August 1998. The provisions of this permit were not included in the operating permit.
2. APCP Construction Permit #0897-022
Special Condition 8 stated that the Director may require the permittee to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate odors if a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.080. 10 CSR 10-3.080 regulated the emission of visible air contaminants and was rescinded on May 30, 2000. 10 CSR 10-3.090 regulates the restriction of odors and therefore has been cited in Permit Condition EU0090-001.
3. APCP Construction Permit #0198-012
Special Condition 3 established an emission limit for EU0050 of less than 10 tons of any individual HAP and less than 25 tons of combined HAP emissions in any consecutive 12-month period. Special Condition 4 established HAP record keeping requirements. These emission limits are redundant with Permit Condition PW002, a voluntary installation-wide emission limit of less than 10 tons of any individual HAP and less than 25 tons of combined HAP emissions in any consecutive 12-month period. Consequently, separate emission limits for HAPs from EU0050 have not been included in Permit Condition EU0050-001.
4. APCP Construction Permit #012000-022
Special Condition 3 established an emission limit for EU0060 of less than 10 tons each of Xylene, Hexane, and Toluene and 25 tons of combined HAP emissions in any consecutive 12-month period. Special Condition 4 established HAP record keeping requirements. These emission limits are redundant with Permit Condition PW002, a voluntary installation-wide emission limit of less than 10 tons of any individual HAP and less than 25 tons of combined HAP emissions in any consecutive 12-month period. Consequently, separate emission limits for Xylene, Hexane, and Toluene have not been included in Permit Condition EU0060-001. Special Condition 6, which prohibits the permittee from using an adhesive that contains HAP's other than Xylene, Hexane and Toluene, has been included in Permit

Condition EU0060-001. In addition, a record keeping requirement to demonstrate that only adhesives containing than Xylene, Hexane and Toluene are used with EU0060 has been included in Permit Condition EU0060-001.

5. APCP Construction Permit #052002-007

On September 10, 2003, the APCP eliminated Special Conditions 2.A, 2.C, and 2.D of this permit based on the performance tests conducted by Collins and Aikman on March 18, 2003. Special Conditions 2.A, 2.C, and 2.D have not been included in Permit Condition EU0050-001.

Special Condition 1.A established an emission limit for EU0040 of less than 10 tons of Triethylamine and Xylene Compounds per consecutive 12-month period. This emission limit is redundant with Permit Condition PW002, an installation wide emission limit of less than 10 tons of any individual HAP in any consecutive 12-month period. Consequently, separate emission limits for Triethylamine and Xylene Compounds have not been included in Permit Condition EU0040-001.

NSPS Applicability

None

MACT Applicability

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

This rule does not apply to the parts washers (EU0090) because these units do not use halogenated solvent cleaners.

40 CFR Part 63, Subpart U, *National Emission Standards for Hazardous Air Pollutants Emissions: Group I Polymers and Resins*

This rule does not apply because the permittee does not have any elastomer product process units.

40 CFR Part 63, Subpart JJJ, *National Emission Standards for Hazardous Air Pollutants: Group IV Polymers and Resins*

This rule does not apply because the permittee does not have any thermoplastic product process units.

40 CFR Part 63, Subpart PPP, *National Emission Standards for Hazardous Air Pollutants Emissions for Polyether Polyols Production*

This rule does not apply because the permittee does not have any polyether polyol manufacturing process units.

40 CFR Part 63, Subpart HHHHH, *National Emission Standards for Miscellaneous Coating Manufacturing*

This rule does not apply because the permittee does not manufacture coatings.

40 CFR Part 63, Subpart MMMM, *Surface Coating of Miscellaneous Metal Parts and Products*

This rule does not apply because the permittee does not surface coat miscellaneous metal parts and/or products.

40 CFR Part 63, Subpart PPPP, *Surface Coating of Plastic Parts and Products*

The permittee has the potential to exceed the major source threshold for HAPs and be affected by Subpart PPPP. However, the installation has voluntarily agreed to federally enforceable emission limits of less than 10 tons of any single HAP and/or 25 tons of combined HAPs in any consecutive 12-month period. Operating under this condition will ensure that this installation is not a major source for HAPs and so not subject to the MACT requirements for Subpart PPPP.

40 CFR Part 63, Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production*

The permittee has the potential to exceed the major source threshold for HAPs and be affected by Subpart WWWW. However, the installation has voluntarily agreed to federally enforceable emission limits of less than 10 tons of any single HAP and/or 25 tons of combined HAPs in any consecutive 12-month period. Operating under this condition will ensure that this installation is not a major source for HAPs and so not subject to the MACT requirements for Subpart WWWW.

NESHAP Applicability

40 CFR Part 61, Subpart M, *National Emission Standards for Asbestos*

This rule applies to the installation because of the renovation and demolition parts of the subpart, which make the subpart applicable to all sources. It is included as a core permit requirement.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

At the time of issuance, the permittee does not have any emission units subject to the applicability portion of 40 CFR Part 64 requiring submittal of a CAM plan.

Other Regulatory Determinations

10 CSR 10-6.220, *Restriction of Visible Air Contaminants*

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

These regulations were not applied to the combustion units at the installation since they combust only natural gas. Aside from products of combustion, they also emit VOC's from the associated operations. However, it is highly unlikely that emissions from these units will result in an exceedance of 10-6.220 or 10-6.260.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Process*

Paint Booths 3A and 4A

The following table shows that Paint Booths 3A and 4A emit less than 0.5 lb PM/hr and, in accordance with 10 CSR 10-6.400(1)(B)11, are exempt from 10 CSR 10-6.400.

3A	2.75	0.0014	35	700	50%	0.48
4A	2.58	0.0013	34	680	50%	0.44

MHDR of paint usage is limited by part throughput

Sample Calculation

Potential PM Emission Rate:

Emission Factor = (X% solids/100)(2000) = (35/100)(2000) = 700 lb/ton

$$\text{Potential Emission Rate} = (\text{MHDR})(\text{Emission Factor}) \left(1 - \frac{\text{Transfer eff}}{100} \right)$$

$$\text{Potential Emission Rate} = \frac{0.0014 \text{ ton}}{\text{hour}} \times \frac{700 \text{ lbs PM}}{\text{ton}} \times (1 - 0.50) = 0.48 \frac{\text{lb PM}}{\text{hour}}$$

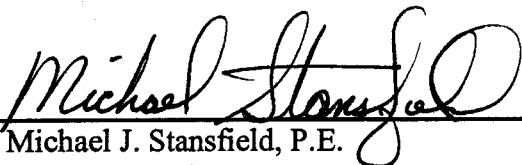
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:



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